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ND-15-0322  
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 4  
Completion of ITAAC 2.3.11.02.ii [Index Number 451] Activated  
Carbon Delay Bed Seismic Analysis

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspection, Test, Analysis and Acceptance Criteria (ITAAC) Item 2.3.11.02.ii [Index Number 451], for verifying that a report exists and concludes that the Gaseous Radwaste System (WGS) Activated Carbon Delay Beds, WGS-MV-02A and WGS-MV-02B, can withstand appropriate seismic design basis loads without loss of its structural integrity function. The closure process for this ITAAC is based on the guidance described in NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52, which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Paulo Albuquerque at 706-826-5531.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox". The signature is written in a cursive, flowing style.

Michael J. Yox  
Regulatory Affairs Director Vogtle 3&4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 2.3.11.02.ii [Index Number 451]

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**Southern Nuclear Operating Company**

**ND-15-0322**

**Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4**

**Completion of ITAAC 2.3.11.02.ii [Index Number 451]**

### **ITAAC Statement**

#### **Design Commitment:**

The equipment identified as having seismic design requirements in Table 2.3.11-1 can withstand seismic design basis loads without loss of its structural integrity function.

#### **Inspections, Tests, Analyses:**

Type tests, analyses, or a combination of type tests and analyses of seismically designed equipment will be performed.

#### **Acceptance Criteria:**

A report exists and concludes that the seismically designed equipment can withstand appropriate seismic design basis loads without loss of its structural integrity function.

### **ITAAC Determination Basis**

Multiple Inspections, Tests, Analyses, Acceptance Criteria (ITAAC) are performed to demonstrate that the equipment in Vogtle Electric Generating Plant (VEGP) Unit 4 Combined Operating License (COL), Appendix C, Table 2.3.11-1 can withstand seismic design basis loads without the loss of its structural integrity function. The equipment identified in Table 2.3.11-1 as having seismic design requirements are the Gaseous Radwaste System (WGS) Activated Carbon Delay Beds; WGS-MV-02A and WGS-MV-02B. The subject ITAAC required that type tests, analyses, or a combination of type tests and analyses be performed on the WGS Activated Carbon Delay Beds.

Seismic loads for the equipment were established using one-half of the AP1000 Safe Shutdown Earthquake (SSE) floor response spectra. Seismic analyses of the WGS Activated Carbon Delay Beds, identified in VEGP Unit 4 COL Appendix C, Table 2.3.11-1, were performed to demonstrate structural integrity in accordance with American Society of Mechanical Engineers Boiler and Pressure Vessel Code Section VIII, Rules for Construction of Pressure Vessels (Reference 3). The analyses are documented in the WGS Delay Bed Design Report (Reference 1) and conclude that the equipment identified in VEGP Unit 4 COL Appendix C Table 2.3.11-1 as having seismic design requirements (See Attachment A) can withstand appropriate seismic design basis loads without loss of its structural integrity function.

### **ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the Vogtle Unit 4 ITAAC Completion Package for ITAAC 2.3.11.02.ii (Reference 2) and available for NRC inspection.

**ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.11.02.ii was performed for VEGP Unit 4 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

**References (available for NRC inspection)**

1. APP-MV6H-VDR-001 Rev. 1, AP1000 MV6H WGS Delay Bed Design Report
2. SVP\_SV0\_003010, Submittal of Updated Inspections, Test, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 4 ITAAC 2.3.11.02.ii (451) (Activated Carbon Delay Bed Seismic Analysis)
3. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section VIII, Rules for Construction of Pressure Vessels, 2001 Edition with 2003 Addenda

**Attachment A**

SEISMICALLY DESIGNED EQUIPMENT ITAAC COMPLIANCE TABLE

SYSTEM: Gaseous Radwaste System

<b>Equipment Name</b>	<b>Tag No.</b>	<b>Seismic Category I</b>	<b>Type of Qualification</b>	<b>Responsible Organization</b>	<b>Design Report Number</b>
WGS Activated Carbon Delay Bed A	WGS-MV-02A	No (1)	Analysis	WEC	APP-MV6H-VDR-001 Rev.1
WGS Activated Carbon Delay Bed B	WGS-MV-02B	No (1)	Analysis	WEC	APP-MV6H-VDR-001 Rev.1

- (1) The WGS activated carbon delay beds (WGS-MV-02A and WGS-MV-02B) are designed to one-half SSE.